

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ULKU ROWE,

Plaintiff,

-against-

GOOGLE LLC,

Defendant.

No. 1:19-cv-08655 (LGS)(GWG)

**DECLARATION OF KEVIN LUCAS
IN SUPPORT OF DEFENDANT
GOOGLE LLC'S MOTION FOR
SUMMARY JUDGMENT**

I, KEVIN LUCAS, declare:

1. I am a Director, Human Resources for Defendant Google LLC. I have personal knowledge of the facts set forth in this declaration, or know them to be true in my capacity as an employee for Google based on records that Google keeps in the regular course of business. I could and would competently testify to these facts under oath if called as a witness.

2. I have worked in Google's Human Resources organization since approximately July 2013, and have supported various groups within Google's Cloud product area since approximately February 2018. Currently, I support the business to manage their cyclical programs (*e.g.*, semi-annual performance reviews), onboard new leadership, maximize organizational effectiveness, develop talent, and other similar initiatives.

Job Classifications at Google

3. In my capacity as a Director, Human Resources, I am familiar with Google's organizational structure and how it classifies jobs.

4. Each job at Google corresponds with a **job code**. A job code broadly defines individuals performing similar functions. Not every individual in a single job code, however, occupies the same role. Within a job code, employees may have different responsibilities, report to different supervisors, work in different product areas, and perform unique functions within their

respective organizations. Most job codes at Google span multiple product areas, and nearly every job code covers multiple different roles across the entire company. Individual employees report to managers in their specific organization, so that even employees with the same job code can report to hundreds of different managers across Google.

5. Job codes are organized into **job families**, a group of jobs with a common set of general attributes. Like job codes, job families are not unique to specific organizations or even product areas within Google. Jobs within a single job family can be (and often are) spread across the company. The people who perform those jobs can (and often do) work in different organizations within Google and report to different managers.

6. Different jobs within a single job family are often—though not always—organized into one or more **job ladders**, which serve as guidelines to identify general expectations and criteria for the job family as one progresses in seniority and responsibility.

7. There is no one-to-one relationship between job families and job ladders. Some job families have one job ladder; others have many. Within a Software Engineering job family, for example, jobs are organized into two separate job ladders depending on whether the role requires people manager responsibilities. Some job families are not organized by ladder at all.

8. Each employee is assigned a **job level**, ranging from level 1 (entry level) to level 9 (the highest director-level position before one becomes a Vice President). The job level reflects the scope and complexity of work expected in the role, the expertise and experience necessary for the role, and impact of the role on the organization. Each of these grows as an employee's level increases. Although the core competencies of jobs within a family may be somewhat consistent, the nature of the job changes, often substantially, as the level increases. As a result, the potential to earn greater compensation generally increases from one job level to the next as employees are

expected to demonstrate greater independence and mastery of their subject matter, tackle more complex problems, and demonstrate increased impact on the organization.

9. Each level within a job family is associated with a unique job code. For roles organized into a job ladder, a level corresponds to each individual “rung” on the ladder. For example, if someone is promoted from a level 8 Product Manager to a level 9 Product Manager, his or her job code will change, but the job ladder and the job family will remain the same.

Transfers Between Job Ladders

10. Employees may transfer from one job ladder or job family to another. Employees must generally apply for a transfer and undergo a set of interviews with hiring managers in their target job family or job ladder. Ladder transfers may result in a salary increase or decrease based on the compensation parameters associated with the target job code, a downward adjustment in level, or a new bonus structure. Sometimes there are no changes to pay or level at all.

11. The length of time it takes to complete a transfer varies with the type of transfer as well. Transfers into the Product Manager or Software Engineering ladder, for example, can take several months as the employee undergoes a trial period to demonstrate that he or she can perform the work required of, and has the requisite skill and domain knowledge to succeed in the new role. As part of this process, the employee creates a transfer packet that outlines his or her credentials for the target role, examples of past work that support the transfer request, and statements of manager support. These transfers may result in a downward adjustment to level, as the employee’s level is calibrated to the target job ladder.

The Workday System

12. In my capacity as a Director, Human Resources, I also am familiar with Google’s Human Resources Information System (HRIS), Workday, and the information stored in that

system in the regular course of business. I have access to Workday as part of my role.

13. Google uses Workday to record and maintain information about all of Google's employees, including an employee's start and termination dates, job code, assigned level, assigned organization, supervisor, location, and any changes to that information. An employee's Workday profile also reflects whether he/she is considered a people manager or individual contributor (meaning he or she has no direct reports and does not have people management responsibilities).

14. Workday also records an employee's **job title** and his or her **business title**, and any changes thereto. The job title field in Workday reflects the official label associated with the employee's specific job code. In contrast, a business title can be used across multiple job codes at Google, and employees have latitude to change their business title without changing their role. For example, plaintiff Ulku Rowe's Workday profile reflects that her job title is Principal Technical Solutions Consultant, the same job title assigned to all individuals with her particular job code, 5560. Workday also reflects the business title she has chosen to use over time, which include Technical Director, Office of the CTO and Technical Director, Financial Services.

15. I was asked by counsel for Google to review the information stored in Google's Workday system for Ms. Rowe, individuals identified by Ms. Rowe in connection with this lawsuit, and individuals hired into the Technical Solutions Consultant role within the Office of the CTO at levels 7, 8, and 9 since 2016. I was asked to determine the following information about each of those individuals: (a) effective start date; (b) the job title into which he/she was hired; (c) the level assigned to that job title; (d) his or her assigned Google office location; (e) whether he/she is a people manager; and (f) any changes to that information over time. I understand that Ms. Rowe has asserted allegations specific to individuals in level 8 and level 9 Application Engineers (job codes 3948 and 3949), Product Managers (job codes 5007 and 5013), and Software Engineers (job

codes 3411, 3412, 3413, 3414, , 8317, and 8319), so I have focused my review of the job histories on those job codes in particular.

16. On October 26, 2021, I performed a search of Google's records in Workday for each of the names listed below. The results of that search are as follows.

Technical Directors, OCTO

17. Those with the business title Technical Director in the Office of the CTO ("OCTO") occupy job codes 5560 (level 8) and 5578 (level 9). The job titles in Google's Workday system assigned to those job codes are Principal Technical Solutions Consultant ("TSC") (5560) and Distinguished TSC (5578). Those job codes are associated with the TSC job ladder. Individuals with people manager responsibilities originally in job codes 5560 and 5578 were officially reclassified to job codes 5565 and 5565, respectively, in or around May 2021.

18. **Ulku Rowe:** Google hired Ms. Rowe effective March 13, 2017, as a level 8 Principal TSC (job code 5560) in OCTO, reporting to Will Grannis. Effective June 25, 2018, she was transferred to the Global Alliances and Industry Platform ("GAIP") team focusing on financial services clients, reporting to Tariq Shaukat. Effective April 26, 2019, Ms. Rowe transferred back to OCTO, reporting to Mr. Grannis again. Her job title, level, and job code have remained unchanged since her hire. Ms. Rowe is and always has been based in New York City. Ms. Rowe is not a people manager.

19. **Ron Bodkin:** Google hired Mr. Bodkin effective October 23, 2017, as a level 8 Principal TSC (job code 5560) in OCTO, reporting to Scott Penberthy. Mr. Bodkin was based in California. He was never a people manager.

20. **Jesse Burns:** Google hired Mr. Burns effective April 30, 2018, as a level 8 Principal

TSC (job code 5560) in OCTO, reporting to Will Grannis. He was reclassified to job code 5565, Director, TSC (still level 8) effective May 3, 2021. Mr. Burns was based in California. He was not a people manager.

21. **Jonathan Donaldson:** Google hired Mr. Donaldson effective February 13, 2017, as a level 9 Distinguished TSC (job code 5578) in OCTO, reporting to Will Grannis. He was reclassified to job code 5566, Director, TSC (still level 9) effective May 3, 2021. Mr. Donaldson is and has always been a remote worker based in Oregon. He is currently a people manager.

22. **Marcus East:** Google hired Mr. East effective May 28, 2019, as a level 8 Principal TSC (job code 5560) in OCTO, reporting to Will Grannis. Mr. East was based in California. He was briefly a people manager prior to his departure, but left Google before his job code could be changed to reflect that fact.

23. **Evren Eryurek:** Google hired Mr. Eryurek effective October 31, 2016, as a level 9 Distinguished TSC (job code 5578) in OCTO, reporting to Will Grannis. Effective June 25, 2018, he was transferred to the GAIP team focusing on healthcare clients, reporting to Greg Moore. His job title, level and job code did not change with this transfer. Effective August 13, 2018, Mr. Eryurek moved to the Google Cloud Platform, Data Analytics organization reporting to Sudhir Hasbe. His job title, level, and job code did not initially change, but Mr. Eryurek completed a job ladder transfer to a Director, Product Management role (job code 5007) effective March 18, 2019. His level was realigned to level 8 as a result. Mr. Eryurek is and always has been based in California. Mr. Eryurek is currently a people manager.

24. **Patricia Florissi:** Google hired Ms. Florissi effective May 4, 2020, as a level 8 Principal TSC (job code 5560) in OCTO, reporting to Jonathan Donaldson. Ms. Florissi has always been a remote worker based in New York State. She is not a people manager.

25. **Kawaljit Gandhi:** Google hired Mr. Gandhi effective November 6, 2006, as a level 5 PSO Senior Sales Engineer in the GCC–Specialty–Mobile organization. Mr. Gandhi was promoted to a level 8 Director, TSC role (job code 5565) in the gUP–Commerce organization effective December 1, 2014. He joined OCTO effective September 11, 2017, reporting to Will Grannis. His job title, job code, and level did not change as a result. He was promoted to a level 9 Director, TSC role (job code 5566) effective November 1, 2020. Mr. Gandhi is and always has been based in California. He is a people manager.

26. **Will Grannis:** Google hired Mr. Grannis effective March 30, 2015, as a level 8 Google Cloud, Program Management Director. He started working in OCTO reporting to Brian Stevens effective July 13, 2016. He was reclassified as a level 8 Director, TSC (job code 5565) effective August 12, 2016. He was promoted to a level 9, Director, TSC role (job code 5566) effective May 1, 2017. Mr. Grannis is based in Austin, Texas, and before that he had been based in California. He is currently a people manager, and has supervised several of the individuals identified in this Declaration.

27. **Nicholas Harteau:** Google hired Mr. Harteau effective May 15, 2017, as a level 9 Distinguished TSC (job code 5578) in OCTO, reporting to Will Grannis. Effective September 4, 2018, he transferred to the Ops Management organization reporting to Eyal Manor. His job title, level and job code initially did not change. Mr. Harteau started reporting to Yanbing Li effective June 24, 2019. He completed a job ladder transfer to a Director–SWE role (job code 8317) effective February 6, 2020. His level was realigned to level 8 as a result. He remained in this role until he left Google effective May 28, 2020. Mr. Harteau was based in New York. Mr. Harteau was a people manager and had been since 2018.

28. **Dean Hildebrand:** Google hired Mr. Hildebrand effective July 31, 2017, as a level

8 Principal TSC (job code 5560) in OCTO, reporting to Will Grannis. He now reports to Eric Schenk. Mr. Hildebrand is and has always been based in Seattle, Washington. He is not a people manager.

29. **Mark Kropf:** Google hired Mr. Kropf effective January 6, 2020, as a level 8 Principal TSC (job code 5560) in OCTO, reporting to Jonathan Donaldson. Mr. Kropf is and has always been based in New York City. He is not a people manager.

30. **Ben McCormack:** Google hired Mr. McCormack effective November 5, 2018, as a level 8 Principal TSC (job code 5560) in OCTO, reporting to Will Grannis. Mr. McCormack is and has always been based in California. He is not a people manager.

31. **Michael Marano:** Google hired Mr. Marano effective August 14, 2017, as a level 8 Principal TSC (job code 5560) in OCTO, reporting to Will Grannis. Mr. Marano is and has always been based in California. He is not a manager.

32. **Massimo Mascaro:** Google hired Mr. Mascaro effective November 13, 2017, as a level 8 Principal TSC (job code 5560) in OCTO, reporting to Scott Penberthy. He now reports to Kawaljit Gandhi. He is and has always been based in California. He is not a people manager.

33. **Joel Minton:** Google hired Mr. Minton effective August 27, 2018, as a level 8 Principal TSC (job code 5560) in OCTO, reporting to Eric Schenk. Mr. Minton is and has always been based in Washington, D.C. He is not a people manager.

34. **Scott Penberthy:** Google hired Scott Penberthy effective December 5, 2016, as a level 8 Principal TSC (job code 5560) in OCTO, reporting to Will Grannis. He now reports to Kawaljit Gandhi. Mr. Penberthy was initially based in New York City, but relocated to California effective October 2, 2017, where he is currently based. He has been a people manager at times.

35. **Eric Schenk:** Google hired Mr. Schenk effective December 4, 2017, as a level 8

Principal TSC (job code 5560) in OCTO, reporting to Will Grannis. He was reassigned to job code 5565, Director, TSC (still level 8) effective May 3, 2021. Mr. Schenk is and has always been based in Seattle, Washington. He is currently a people manager.

36. **Jeff Sternberg:** Google hired Mr. Sternberg effective September 23, 2019, as a level 8 Principal TSC (job code 5560) in OCTO, reporting to Kawaljit Gandhi. Mr. Sternberg is and has always been based in New York City. He is not a people manager.

37. **Bryan Stiekes:** Google hired Mr. Stieckes effective January 23, 2017, as a level 8 Principal TSC (job code 5560) in OCTO, reporting to Will Grannis. He now reports to Eric Schenk. Mr. Stiekes has always been a remote worker based in Michigan. He is not a people manager.

38. **Paul Strong:** Google hired Mr. Strong effective January 9, 2017, as a level 9 Distinguished TSC (job code 5578) in OCTO, reporting to Will Grannis. Mr. Strong is and always has been based in California. He is not a people manager.

39. **Ben Wilson:** Google hired Mr. Wilson effective February 6, 2017 as a level 9 Distinguished TSC (job code 5578) in OCTO, reporting to Will Grannis. Effective June 25, 2018, he was transferred to the GAIP team focusing on oil, gas and energy clients, reporting to Darryl Willis. His job title, level and job code did not change as a result of this transfer. Effective July 25, 2019, Mr. Wilson transferred to the Cloud Solutions organization and later the Google Cloud Technology Solutions organization effective February 18, 2020. His job title, level, and job code remained the same until he left Google effective March 17, 2021. Mr. Wilson was a remote worker based in Texas. He was a people manager at times prior to his departure.

Software Engineers

40. Level 8 and 9 Software Engineers occupy one of two job ladders. Individual contributors are associated with job codes 3411 (level 8) and 3413 (level 9), and the Software

Engineering Job Ladder for Individual Contributors, attached as Exhibit 2 (excerpted). People managers are associated with job codes 8317 (level 8) and 8319 (level 9), and the Tech Manager job ladder, attached as Exhibit 2 (excerpted). Job codes 3412 (DNU–Director, Software Engineering) and 3414 (DNU–Director, Software Engineering) have been deprecated, which is why the indicator DNU (or Do Not Use) appears in the job title. Job codes 3412 and 3414 have been replaced by job codes 8317 and 8319, respectively, and individuals in those job codes when they were deprecated were reclassified accordingly.

41. **David Baker:** Mr. Baker held a level 8 Director, Software Engineering role (job code 3412) from November 19, 2010 to February 19, 2018, when he was reclassified to Director–SWE¹ (job code 8317, still level 8). He remained in that job code until January 20, 2021. Mr. Baker never worked in OCTO reporting to Will Grannis, or on the GAIP team reporting to Tariq Shaukat. Mr. Baker was based in California. He was a people manager.

42. **Fausto Bernadini:** Google has held a level 9 Director, SWE role (job code 8319) from January 14, 2019, through the present. He never worked in OCTO reporting to Will Grannis, or on the GAIP team reporting to Tariq Shaukat. Mr. Bernadini is based in New York City. He is a people manager.

43. **Andrew Brook:** Mr. Brook held a level 8 Director, Software Engineering role (job code 3412) from June 18, 2018 until August 15, 2018, when his role was reclassified to Director–SWE (job code 8317, still level 8). He is still in that job code. Mr. Brook has never worked in OCTO reporting to Will Grannis, or on the GAIP team reporting to Tariq Shaukat. Mr. Brook is based in California. He is a people manager.

44. **Gordon Chaffee:** Mr. Chaffee held a level 9 Director, Software Engineering role

¹ Director–SWE stands for Director–Software Engineering.

(job code 3414) from April 4, 2016, until March 8, 2018, when his role was reclassified to Director–SWE (job code 8319, still level 9). He remained in that job code until May 2, 2020. He never worked in OCTO reporting to Will Grannis, or on the GAIP team reporting to Tariq Shaukat. Mr. Chaffee was based in California. He was a people manager. At times he supervised other individuals identified in this declaration, including Tim Dierks.

45. **Jeff Cox:** Mr. Cox held a level 8 Director, Software Engineering role (job code 3412) from June 1, 2016, until February 19, 2018, when his role was reclassified to Director–SWE (job code 8317, still level 8). He was promoted to a level 9 Director–SWE role (job code 8319) effective May 1, 2021. He is currently in that job code. He never worked in OCTO reporting to Will Grannis, or on the GAIP team reporting to Tariq Shaukat. Mr. Cox is based in New York City. He is a people manager.

46. **Tim Dierks:** Mr. Dierks held a level 8 Director, Software Engineering role (job code 3412) from November 1, 2017, through February 18, 2018, when his role was reclassified to Director–SWE (job code 8317, still level 8). He is in that job code currently. He never worked in OCTO reporting to Will Grannis, or on the GAIP team reporting to Tariq Shaukat. Mr. Dierks is based in New York City. He is a people manager.

47. **Jetendra Dublish:** Mr. Dublish held a level 8 Director, Software Engineering role (job code 3412) from May 1, 2018 to June 12, 2018, when his role was reclassified to Director–SWE (code job 8317, still level 8). He was in that job code until August 1, 2021. He never worked in OCTO reporting to Will Grannis, or on the GAIP team reporting to Tariq Shaukat. Mr. Dublish was based in New York City. He was a people manager.

48. **Andrew Erlichson:** Mr. Erlichson held a level 8 Director, Software Engineering role (job code 3412) from November 6, 2017, until August 15, 2018, when his role was reclassified

to Director–SWE (job code 8317, still level 8). He is in that job code currently. He has never worked in OCTO reporting to Will Grannis, or on the GAIP team reporting to Tariq Shaukat. Mr. Erlichson is based in New York City. He is a people manager.

49. **Larry Greenfield:** Mr. Greenfield has held a level 9 Distinguished Software Engineer role (job code 3413) from December 1, 2015 through the present. He never worked in OCTO reporting to Will Grannis, or on the GAIP team reporting to Tariq Shaukat. Mr. Greenfield is based in New York City. He is not a people manager.

50. **Michael Guntsch:** Mr. Guntsch held a level 8 Director, Software Engineering role (job code 3412) effective June 1, 2015, until February 19, 2018, when his role was reclassified to Director–SWE (job code 8317, still level 8). He is in that job code currently. He never worked in OCTO reporting to Will Grannis, or on the GAIP team reporting to Tariq Shaukat. Mr. Guntsch has primarily been based in Germany, but was based in New York City from August 1, 2016, until June 15, 2021. He is a people manager.

51. **Andrew Hogue:** Mr. Hogue has held a level 8 Director–SWE role (job code 8713) from January 14, 2019 through the present. He never worked in OCTO reporting to Will Grannis, or on the GAIP team reporting to Tariq Shaukat. Mr. Hogue is based in New York City. He is a people manager.

52. **Fuzzy Khosrowshahi:** Mr. Khosrowshahi held a level 9 Director, Software Engineering role (job code 3414) from December 1, 2013, until March 8, 2018, when his role was reclassified to Director–SWE (job code 8319, still level 9). He held that job code until May 1, 2020. He never worked in OCTO reporting to Will Grannis, or on the GAIP team reporting to Tariq Shaukat. Mr. Khosrowshahi was based in New York City. He was a people manager.

53. **Sailesh Krishnamurthy:** Mr. Krishnamurthy held a level 9 Director–SWE role

(job code 8319) from August 26, 2019, through the present. He never worked in OCTO reporting to Will Grannis, or on the GAIP team reporting to Tariq Shaukat. Mr. Krishnamurthy is based in California. He is a people manager. He has supervised some of the individuals named in this declaration including Andrew Brook, Alex Lloyd, Carter Page, and Damien Reeves.

54. **Alex Lloyd:** Mr. Lloyd held a level 8 Principal Software Engineer role (job code 3411) from December 1, 2016, through the present. He has never worked in OCTO reporting to Will Grannis, or on the GAIP team reporting to Tariq Shaukat. Mr. Lloyd is based in New York City. He is not a people manager.

55. **Jack Lo:** Mr. Lo held a level 9 Director, Software Engineering role (job code 3414) from April 18, 2016, until March 8, 2018, when his role was reclassified to Director–SWE (job code 8319, still level 9). He is in that job code currently. He never worked in OCTO reporting to Will Grannis, or on the GAIP team reporting to Tariq Shaukat. Mr. Lo is based in California. He is a people manager.

56. **Dave Mandelbaum:** Mr. Mandelbaum held a level 8 Director, Software Engineering role (job code 3412) from December 1, 2015, until February 19, 2018, when his role was reclassified to Director–SWE (job code 8317, still level 8). He is in that job code currently. He never worked in OCTO reporting to Will Grannis, or in the Google GAIP organization reporting to Tariq Shaukat. Mr. Mandelbaum is based in New York City. He is a people manager.

57. **Marcus Mitchell:** Mr. Mitchell has held a level 9 Director, Software Engineering role (job code 3414) from June 1, 2013, until March 8, 2018, when his role was reclassified to Director–SWE (job code 8319, still level 9). He remained in that job code until June 3, 2019. He never worked in OCTO reporting to Will Grannis, or on the GAIP team reporting to Tariq Shaukat. Mr. Mitchell is based in New York City. He is a people manager.

58. **Ravi Murthy:** Mr. Murthy held a level 9 Director–SWE role (job code 8319) from April 8, 2019, through the present. He never worked in OCTO reporting to Will Grannis, or on the GAIP team reporting to Tariq Shaukat. Mr. Murthy is based in California. He is a people manager.

59. **Carter Page:** Mr. Page held a level 8 Director–SWE role (job code 8317) from November 1, 2019, until May 29, 2021. He never worked in OCTO reporting to Will Grannis, or on the GAIP team reporting to Tariq Shaukat. Mr. Page was based in New York City. He was a people manager.

60. **Paolo Raden:** Mr. Raden held a level 8 Director, Software Engineer role (job code 3412) from April 2, 2018, until June 12, 2018, when his role was reclassified to Director–SWE (job code 8317, still level 8). He is in that job code currently. He never worked in OCTO reporting to Will Grannis, or on the GAIP team reporting to Tariq Shaukat. Mr. Raden is based in Seattle, Washington. He is a people manager.

61. **Damian Reeves:** Mr. Reeves held a level 8 Director, Software Engineering role (job code 3412) from May 1, 2017, until February 19, 2018, when his role was reclassified to Director–SWE role (job code 8317, still level 8). He was in that job code until February 27, 2021. He never worked in OCTO reporting to Will Grannis, or on the GAIP team reporting to Tariq Shaukat. He was based in either California or Washington State. He was a people manager.

62. **Brian Rogan:** Mr. Rogan held a level 8 Principal Software Engineer role (job code 3411) from June 1, 2015, until November 1, 2018, when he was promoted to a level 9 Director–SWE role (job code 8319). He is in that job code currently. He never worked in OCTO reporting to Will Grannis, or on the GAIP team reporting to Tariq Shaukat. Mr. Rogan is based in Cambridge, Massachusetts. He is a people manager.

63. **Mendel Rosenblum:** Mr. Rosenblum held a level 9 Distinguished Software

Engineer role (job code 3413) from December 17, 2015, until March 23, 2019. He never worked in OCTO reporting to Will Grannis, or on the GAIP team reporting to Tariq Shaukat. Mr. Rosenblum was based in California. He was never a people manager.

64. **Steven Saviano:** Mr. Saviano held a level 8 Principal Software Engineer role (job code 3411) from June 1, 2016, to the present. He never worked in OCTO reporting to Will Grannis, or on the GAIP team reporting to Tariq Shaukat. Mr. Smilak is based in New York City. He is not a people manager.

65. **Umesh Shankar:** Mr. Shankar held a level 8 Principal Software Engineer role (job code 3411) from December 1, 2014, to the present. He never worked in OCTO reporting to Will Grannis, or on the GAIP team reporting to Tariq Shaukat. Mr. Shankar is based in New York City. He is not a people manager.

66. **Kevin Smilak:** Mr. Smilak held a 8 level Director, Software Engineering role (job code 3412) from June 1, 2016, until November 1, 2017, when he was promoted to a level 9 Director, Software Engineering role (job code 3414). His role was reclassified to Director–SWE (job code 8319, still level 9) effective March 8, 2018, and he remains in that job code currently. He never worked in OCTO reporting to Will Grannis, or on the GAIP team reporting to Tariq Shaukat. Mr. Smilak has been based in California or Switzerland. He is a people manager.

67. **Baskar Sridharan:** Mr. Sridharan held a level 9 Director–SWE (job code 8319), from October 18, 2019, through the present. He never worked in OCTO reporting to Will Grannis, or on the GAIP team reporting to Tariq Shaukat. Mr. Sridharan is based in Kirkland, Washington. He is a people manager.

68. **Herb Stiel:** Mr. Stiel held a level 9 Director–SWE role (job code 8319) from April 29, 2019, through the present. He never worked in OCTO reporting to Will Grannis, or on the

GAIP team reporting to Tariq Shaukat. Mr. Stiel is based in California. He is a people manager.

69. **James Watts:** Mr. Watts has held a level 8 Director–SWE role (job code 8317) from November 1, 2018, through the present. He never worked in OCTO reporting to Will Grannis, or on the GAIP team reporting to Tariq Shaukat. Mr. Watts is based in New York City. He is a people manager.

70. **Joel Wein:** Mr. Wein held a level 8 Director, Software Engineering role (job code 3412) from May 1, 2017, through February 19, 2018, when his role was reclassified to Director–SWE (job code 8317, still level 8). He was promoted to a level 9 Director–SWE role (job code 8319) effective May 1, 2021, and is in that job currently. He never worked in OCTO reporting to Will Grannis, or on the GAIP team reporting to Tariq Shaukat. He is based in New York City. He is a people manager.

71. **Fayyaz Younas:** Mr. Younaz has held a level 8 Director, Software Engineering role (job code 3412) from October 16, 2017, until February 19, 2018, when his role was reclassified to Director–SWE (job code 8317, still level 8). He was promoted to a level 9 Director–SWE role (job code 8319) effective November 1, 2020, and was in that job code until March 27, 2021. He never worked in OCTO reporting to Will Grannis, or on the GAIP team reporting to Tariq Shaukat. Mr. Younas was based in California. He was a people manager.

Application Engineers

72. Level 8 and 9 Application Engineers are associated with job codes 3948 (level 8) and 3949 (level 9), and occupy the Application Engineer job ladder, attached as Exhibit 3.

73. **David Gartside:** Mr. Gartside held a level 9 Director, Application Engineer role (job code 3949) from August 3, 2016, until December 8, 2018. He never worked in OCTO reporting to Will Grannis, or on the GAIP team reporting to Tariq Shaukat. he was based in New

York City from August 14, 2017, until December 8, 2018. He was a people manager.

74. **Venkat Mukkamala:** Mr. Mukkamala held a level 8 Director, Application Engineering role (job code 3948) from August 3, 2016, until April 14, 2021, when he transferred to a level Director–SWE role (job code 8317). He is in that latter job code currently. He never worked in OCTO reporting to Will Grannis, or on the GAIP team reporting to Tariq Shaukat. Mr. Mukkamala is based in New York City. He is a people manager.

75. **Srivats Ramaswami:** Mr. Ramaswami has held a level 8 Director, Application Engineering role (job code 3948) from January 28, 2019, through the present. He never worked in OCTO reporting to Will Grannis, or on the GAIP team reporting to Tariq Shaukat. Mr. Ramawami is based in California. He is a people manager.

Product Managers

76. Level 8 and 9 Product Managers are associated with job codes 5007 (level 8) and 5013 (level 9), and occupy the Product Manager job ladder, attached as Exhibit 4 (excerpted).

77. **Mike Aiello:** Mr. Aiello held a level 8 Director, Product Management role (job code 5007) from May 1, 2018, until October 29, 2019. He never worked in OCTO reporting to Will Grannis, or on the GAIP team reporting to Tariq Shaukat. Mr. Aiello was based in New York City. He was a people manager.

78. **Sudhir Hasbe:** Mr. Hasbe held a level 8 Director, Product Management (job code 5007) from October 23, 2017, until November 1, 2020, when he was promoted to a level 9 Director, Product Manager role (job code 5013). He is in that job code currently. He never worked in OCTO reporting to Will Grannis, or on the GAIP team reporting to Tariq Shaukat. Mr. Hasbe is based in Seattle, Washington. He is a people manager. He has supervised individuals identified in this Declaration, including Evren Eryurek, Jonathan Keller, and Craig Wiley.

79. **Scott Johnston:** Mr. Johnston has held a level 8 Director, Product Management role (job code 5007) from December 1, 2012, through the present. He never worked in OCTO reporting to Will Grannis, or on the GAIP team reporting to Tariq Shaukat. Mr. Johnston is based in New York City since 2009. He is a people manager.

80. **Jonathan Keller:** Mr. Keller has held a level 8 Director, Product Management role (job code 5007) from September 16, 2019, through the present. He never worked in OCTO reporting to Will Grannis, or on the GAIP team reporting to Tariq Shaukat. Mr. Keller is based in Kirkland, Washington. He is a people manager.

81. **Jess Leroy:** Mr. Leroy held a level 8 Director, Product Management role (job code 5007) from March 6, 2017, until November 1, 2020, when he was promoted to a level 9 Director, Product Management role (job code 5013). He is currently in this job code. Mr. Leroy never worked in OCTO reporting to Will Grannis, or on the GAIP team reporting to Tariq Shaukat. Mr. Leroy is based in California. He is a people manager.

82. **Dave Nettleton:** Mr. Nettleton has held a level 8 Director, Product Management role (job code 5007) from November 1, 2018, through the present. He never worked in OCTO reporting to Will Grannis, or on the GAIP team reporting to Tariq Shaukat. Mr. Nettleton is based in Seattle, Washington. He is a people manager.

83. **Dominic Preuss:** Mr. Preuss held a level 8 Director, Product Management role (job code 5007) from May 1, 2017, through September 3, 2021. He never worked in OCTO reporting to Will Grannis, or on the GAIP team reporting to Tariq Shaukat. Since April 4, 2016, Mr. Preuss was based in California. He was not a people manager.

84. **Sam Srinivas:** Mr. Srinivas has held a level 8 Director, Product Management role (job code 5007) from April 11, 2011, through the present. He never worked in OCTO reporting to

Will Grannis, or on the GAIP team reporting to Tariq Shaukat. Mr. Srinivas is based in California. He is a people manager.

85. **Oren Teich:** Mr. Teich has held a level 8 Director, Product Management role (job code 5007) from April 17, 2017 until May 2, 2021. Until June 1, 2017, Mr. Teich worked in OCTO, but did not report to Will Grannis. He never worked on the GAIP team reporting to Tariq Shaukat. He was based in California. He was a people manager.

86. **Alex Vogenthaler:** Mr. Vogenthaler held a level 8 Director – Product Manager role (job code 5007) May 1, 2017, until September 2, 2020. He never worked in OCTO reporting to Will Grannis, or on the GAIP team reporting to Tariq Shaukat. Since 2010 Mr. Vogenthaler was based in Boudler, Colorado. He was a people manager.

87. **Craig Wiley:** Mr. Wiley has held a level 8 Director, Product Management role (job code 5007) from May 14, 2018, through the present. He never worked in OCTO reporting to Will Grannis, or on the GAIP team reporting to Tariq Shaukat. Mr. Wiley is based in Kirkland, Washington. He is a people manager.

Global Client Leads

88. There is no formal Global Client Lead job title in Workday. It was a concomitant business title for some individuals who worked on the GAIP team reporting to Tariq Shaukat.

89. **Anil Jain:** Mr. Jain has held a level 9 Director, Partnerships (job code 2717) from the date of his hire on January 22, 2019, through the present. Mr. Jain works on what was formerly the GAIP team focusing on Media and Entertainment clients, originally reporting to John Honeycutt (and later, Mr. Honeycutt's successors). He never worked in OCTO reporting to Will Grannis. Mr. Jain is based in California. Mr. Jain is a people manager and has supervised other individuals identified in this Declaration, including Caleb Weinstein.

90. **Paul Torrey:** Mr. Torrey held a level 8 Director, Partnerships role (job code 2716) from the date of his hire on April 9, 2018, until he left Google on November 3, 2018. He worked on the GAIP team focused on healthcare clients, reporting to Greg Moore. He never worked in OCTO reporting to Will Grannis. Mr. Torrey was based in California. He was a people manager.

91. **Caleb Weinstein:** Mr. Weinstein has held a level 8 Director, Partnerships role (job code 2716) from the date of his hire on August 27, 2018, through the present. Until October 2021, he worked on what was formerly the GAIP team focusing on media and entertainment clients, initially reporting to Sunil Rayan and later Anil Jain. He never worked in OCTO reporting to Will Grannis. Mr. Weinstein is based in California. He is not a people manager.

Global Client Technical Leads

92. There is no formal Global Client Technical Lead job title in Workday. It was a concomitant business title for some individuals who worked on the GAIP team reporting to Tariq Shaukat.

93. **Carlos Boneti:** Mr. Boneti held a level 6 Staff Technical Solutions Consultant role (job code 5558) from October 1, 2018, until December 2, 2019, when he transferred to a level 6 Staff Software Engineer role (job code 3407).. He worked on the GAIP team focusing on oil, gas and energy clients, initially reporting to Kanai Pathak. He never worked in the OCTO organization reporting to Will Grannis. Mr. Boneti has been based in California or Washington state. He is not a people manager.

94. **Aashima Gupta:** Google hired Ms. Gupta as a level 7 Senior Staff TSC (job code 5559) effective November 16, 2016. She joined the GAIP team focusing on Healthcare clients, reporting to Greg Moore (and later his successors) effective May 8, 2017, and was promoted to a level 8 Director, TSC role (job code 5565) effective November 1, 2018. She remains in that job

code currently. She never worked in the OCTO organization reporting to Will Grannis. Ms. Gupta is based in California. She is a people manager.

95. **Kanai Pathak:** Google hired Mr. Pathak as a level 7 Senior Staff TSC (job code 5559) effective June 11, 2018. He remained in that role until March 29, 2021, when he transferred to a level 7 Manager, Application Engineering role. He remains in that job code currently. He worked on the GAIP team focusing on oil, gas and energy clients, reporting to Darryl Willis (and later his successors) until March 16, 2020. He never worked in OCTO reporting to Will Grannis. Mr. Pathak is based in California. He is not a people manager.

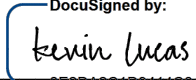
Other

96. **Stuart Breslow:** Google hired Mr. Breslow as a Level 9 Director, Solutions Consultant (job code 5552) effective July 16, 2018. He remained in that job code until he left Google on July 2, 2020. He reported to Tariq Shaukat. He never worked in OCTO reporting to Will Grannis. Mr. Breslow was based in New York City. He was initially an individual contributor, but later became a people manager.

97. **David LaBianca:** Mr. LaBianca held a level 9 Security Engineering Director role (job code 1275) from December 9, 2019, to the present. He never worked in OCTO reporting to Will Grannis or on the GAIP team reporting to Tariq Shaukat. Mr. LaBianca is based in New York City. He is a people manager.

PURSUANT TO 28 U.S.C. § 1746, I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT. I AM AWARE THAT IF ANY OF THE FOREGOING STATEMENTS MADE BY ME ARE FALSE, I AM SUBJECT TO PUNISHMENT.

Executed this ²⁷ day of October, 2021, at San Francisco, California.

DocuSigned by:

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Kevin Lucas